

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VICTORIA FLORES, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GRUBHUB INC., a Delaware corporation,

Defendant.

Case No. 1:16-cv-05105

Honorable Sharon Johnson Coleman

**DEFENDANT’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Defendant, Grubhub Inc. (“Grubhub”), by its undersigned attorneys and pursuant to Federal Rule of Civil Procedure 6(b), files this unopposed motion to extend the time to answer or otherwise plead to Plaintiff’s Complaint by 30 days, until and including June 16, 2016. In support of this motion, Grubhub states as follows:

1. On March 31, 2016, Plaintiff filed a putative class action complaint against Grubhub in the Circuit Court of Cook County alleging that it sent unsolicited text messages in violation of the federal Telephone Consumer Protection Act. (Dkt. 1 at Ex. A.)

2. Grubhub was served with the Complaint on April 11, 2016, and timely removed the Complaint to this Court on May 10, 2016. (Dkt. 1.) Therefore, Grubhub’s responsive pleading currently is due seven days after removal on May 17, 2016. Fed. R. Civ. P. 81(c)(2)(C).

3. Grubhub recently retained Reed Smith LLP as its counsel to defend this case. Counsel requests 30 additional days, until and including June 16, 2016, to investigate the applicable law and facts related to the claims alleged in the Complaint and formulate its responsive pleading.

4. This is Grubhub's first request for an extension of time and it is not being interposed for purposes of delay.

5. Plaintiff's counsel, Ben Richman, has indicated that Plaintiff does not oppose this request for extension.

WHEREFORE, Grubhub respectfully requests that the Court grant its unopposed motion for a 30-day extension of time, until and including June 16, 2016, in which to file a responsive pleading to Plaintiff's Complaint.

Date: May 11, 2016.

Respectfully submitted,

Grubhub Inc.,
Defendant

By: /s/ Henry Pietrkowski
One of Its Attorneys

Henry Pietrkowski
Timothy R. Carwinski
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606-7507
Ph. (312) 207-1000
Fax (312) 207-6400
hpietrkowski@reedsmith.com
tcarwinski@reedsmith.com

CERTIFICATE OF SERVICE

I, Henry Pietrkowski, an attorney for Defendant, hereby certify that on May 11, 2016, a true and correct copy of the foregoing **Defendant's Unopposed Motion for Extension of Time to File Responsive Pleading** was served upon Plaintiff's counsel via first class U.S. Mail, postage-prepaid, by causing it to be dropped in the mail slot at 10 S. Wacker Dr., Chicago, IL 60606 and addressed as follows:

Jay Edelson
Benjamin H. Richman
Courtney C. Booth
Edelson PC
350 North LaSalle Street, 13th Floor
Chicago, IL 60654

/s/ Henry Pietrkowski